

**EXHIBIT 31**

**Biller, Arthur**

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**From:** Lawrence, J. Alexander [ALawrence@mofo.com]  
**Sent:** Monday, July 22, 2013 1:35 PM  
**To:** James, Emma  
**Cc:** cshore@whitecase.com; vanessa.soderberg@whitecase.com; mcarney@McKoolSmith.com; Eaton, Mary; Abrams, Marc; Baio, Joseph; Shalhoub, Paul; Hardy, Jennifer; GUzzi@milbank.com; pgoodman@McKoolSmith.com; bumari@McKoolSmith.com; Scott, Kennon; lbradley@whitecase.com; GPapeika@milbank.com; DODonnell@milbank.com; Kerr, Charles L.; rlwynne@JonesDay.com; Rebecca.Kahan@dechert.com; keckstein@kramerlevin.com; kotwick@sewkis.com; munno@sewkis.com; glenn.siegel@dechert.com; pkaufman@kramerlevin.com; michael.martinez@mayerbrown.com; rmauceri@morganlewis.com; jgarrrity@morganlewis.com; jgoodchild@morganlewis.com; jrosenthal@morganlewis.com; kit.weitnauer@alston.com; michael.johnson@alston.com; william.hao@alston.com; Mauricio.Espana@dechert.com; hfsidman@JonesDay.com; kmwaag@jonesday.com  
**Subject:** RE: In re Residential Capital LLC

Emma,

Almost all of the documents referenced in Mr. Lipps' Declaration, other than publicly available court decisions, have been produced. The Trustee Proofs of Claims are attached as exhibits to the motion, but we are going to go ahead and send over bates labeled copies of those. I believe Mr. Lipps references some document demands that were exchanged. We will send those over as well.

Regards,

Alex.

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**From:** James, Emma [mailto:EJames@willkie.com]  
**Sent:** Sunday, July 21, 2013 11:15 PM  
**To:** Lawrence, J. Alexander  
**Cc:** cshore@whitecase.com; vanessa.soderberg@whitecase.com; mcarney@McKoolSmith.com; Eaton, Mary; Abrams, Marc; Baio, Joseph; Shalhoub, Paul; Hardy, Jennifer; GUzzi@milbank.com; pgoodman@McKoolSmith.com; bumari@McKoolSmith.com; Scott, Kennon; lbradley@whitecase.com; GPapeika@milbank.com; DODonnell@milbank.com; Kerr, Charles L.; rlwynne@JonesDay.com; Rebecca.Kahan@dechert.com; keckstein@kramerlevin.com; kotwick@sewkis.com; munno@sewkis.com; glenn.siegel@dechert.com; pkaufman@kramerlevin.com; michael.martinez@mayerbrown.com; rmauceri@morganlewis.com; jgarrrity@morganlewis.com; jgoodchild@morganlewis.com; jrosenthal@morganlewis.com; kit.weitnauer@alston.com; michael.johnson@alston.com; william.hao@alston.com; Mauricio.Espana@dechert.com; hfsidman@JonesDay.com; kmwaag@jonesday.com  
**Subject:** Re: In re Residential Capital LLC

Alex.:

Please produce all documents considered or relied upon by Mr. Lipps as soon as possible.

Regards,  
Emma

Emma J. James  
**Willkie Farr & Gallagher LLP**  
787 Seventh Avenue  
New York, New York 10019  
Phone: (212) 728-8689  
Email: [ejames@willkie.com](mailto:ejames@willkie.com)

On Jul 21, 2013, at 6:44 PM, "Lawrence, J. Alexander" <[ALawrence@mofo.com](mailto:ALawrence@mofo.com)> wrote:

Objecting Parties,

Following up on my email below, please let us know by 11 pm tonight whether you want to depose Jeff Lipps.

Mr. Lipps lives and practices in Columbus, Ohio. If he is going to be deposed on Tuesday, he will need to get on a plane tomorrow morning and fly to New York.

Unless someone wants to depose him, he would rather not travel to New York tomorrow morning.

Regards,

Alex.

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**From:** Lawrence, J. Alexander

**Sent:** Friday, July 19, 2013 7:17 PM

**To:** '[cshore@whitecase.com](mailto:cshore@whitecase.com)'; '[vanessa.soderberg@whitecase.com](mailto:vanessa.soderberg@whitecase.com)'; '[mcarney@McKoolSmith.com](mailto:mcarney@McKoolSmith.com)'; '[meaton@willkie.com](mailto:meaton@willkie.com)'; '[mabrams@willkie.com](mailto:mabrams@willkie.com)'; '[jbaio@willkie.com](mailto:jbaio@willkie.com)'; '[pshalhoub@willkie.com](mailto:pshalhoub@willkie.com)'; '[EJames@willkie.com](mailto:EJames@willkie.com)'; '[JHardy2@willkie.com](mailto:JHardy2@willkie.com)'; '[GUzzi@milbank.com](mailto:GUzzi@milbank.com)'; '[pgoodman@McKoolSmith.com](mailto:pgoodman@McKoolSmith.com)'; '[bumari@McKoolSmith.com](mailto:bumari@McKoolSmith.com)'; '[KScott@willkie.com](mailto:KScott@willkie.com)'; '[lbradley@whitecase.com](mailto:lbradley@whitecase.com)'; '[GPapeika@milbank.com](mailto:GPapeika@milbank.com)'; '[DODonnell@milbank.com](mailto:DODonnell@milbank.com)'  
**Cc:** Kerr, Charles L.; '[rlwynne@JonesDay.com](mailto:rlwynne@JonesDay.com)'; '[Rebecca.Kahan@dechert.com](mailto:Rebecca.Kahan@dechert.com)'; '[keckstein@kramerlevin.com](mailto:keckstein@kramerlevin.com)'; '[kotwick@sewkis.com](mailto:kotwick@sewkis.com)'; '[munno@sewkis.com](mailto:munno@sewkis.com)'; '[glenn.siegel@dechert.com](mailto:glenn.siegel@dechert.com)'; '[pkaufman@kramerlevin.com](mailto:pkaufman@kramerlevin.com)'; '[michael.martinez@mayerbrown.com](mailto:michael.martinez@mayerbrown.com)'; '[rmauceri@morganlewis.com](mailto:rmauceri@morganlewis.com)'; '[jgarrrity@morganlewis.com](mailto:jgarrrity@morganlewis.com)'; '[jgoodchild@morganlewis.com](mailto:jgoodchild@morganlewis.com)'; '[jrosenthal@morganlewis.com](mailto:jrosenthal@morganlewis.com)'; '[kit.weitnauer@alston.com](mailto:kit.weitnauer@alston.com)'; '[michael.johnson@alston.com](mailto:michael.johnson@alston.com)'; '[william.hao@alston.com](mailto:william.hao@alston.com)'; '[Mauricio.Espana@dechert.com](mailto:Mauricio.Espana@dechert.com)'; '[hfsidman@JonesDay.com](mailto:hfsidman@JonesDay.com)'; '[kmwaag@jonesday.com](mailto:kmwaag@jonesday.com)'

**Subject:** In re Residential Capital LLC

All

The Debtors have previously designated Jeffrey Lipps and Ron D'Vari as expert witnesses.

The Debtors can make Mr. Lipps available at 10:00 am on Tuesday, July 23, 2013. Please let us know by Sunday whether anyone plans to take Mr. Lipps' deposition.

Although we need to reconfirm that he is available on this date, the Debtors hope to be able to make Ron D'Vari available at 9:00 am on Thursday, July 25, 2013. Please let us know by Monday whether anyone plans to take Mr. D'Vari's deposition.

Regards,

Alex.

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